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9 Attorney for Defendant Rana Kaabawi

10 UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF WASHINGTON

12 UNITED STATES OF AMERICA,

13  
14 Plaintiff,

15 v.

NO. 4:21-CR-6042-SMJ-11

DEFENDANT RANA KAABAWI'S  
STATEMENT OF REASONS IN  
SUPPORT OF THE MOTION TO  
ABATE/STAY PROCEEDINGS

16 ALI ABED YASER  
17 (a/k/a "Abu Hasanain"),  
18 HUSSEIN A. YASIR  
19 (a/k/a "Abu Fakhri"),  
20 INSAF A. KARAWI,  
21 HASANEIN A. YASER,  
22 AHMAD K. BACHAY  
23 (a/k/a "Muthalath," "Humayad"),  
24 MASHAEL A. BACHAY,  
25 MOHAMMAD BAJAY  
26 (a/k/a "Abu Jabbar"),  
27 HUSSAIN K. BACHAY,  
28 NOOR TAHSEEN AL-MAAREJ  
(a/k/a "Noor T. Almarej"),  
ALI F. AL-HIMRANI,  
RANA J. KAABAWI,

DEFENDANT RANA KAABAWI'S STATEMENT OF  
REASONS IN SUPPORT OF THE MOTION TO  
ABATE/STAY PROCEEDINGS - 1 of 3

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1 AMAR F. ABDUL-SALAM,  
2 AMEER R. MOHAMMED,  
3 MOHAMMED F. AL-HIMRANI,  
4 MARIA ELENA SANCHEZ,  
5 SEIFEDDINE A. AL-KINANI,  
6 ABDULLAH AL-DULAIMI,  
7 FIRAS S. HADI,  
8 FAROOQ S. YASEEN,  
9 KHALIL ABDUL-RAZAQ,  
10 JESUS GEORGE SANCHEZ,  
11 SINAN AKRAWI, and  
12 MOHAMMED NAJI AL-JIBORY,

Defendants.

13 My attorney has advised me of my right under the Speedy Trial Act, 18 U.S.C.  
14 §-3161, to go to trial within a 70-day period. My attorney has also advised me that a  
15 continuance of the trial is needed, and we discussed the reasons for a continuance.

16 A motion to continue the trial has been filed.

17  
18 My attorney has advised me, and I understand that, if the Court grants the  
19 motion to continue that all time between the date the motion to continue was filed  
20 and the new date for trial will be excluded from the speedy-trial period under the  
21 Speedy Trial Act.  
22

23  
24 After reviewing the motion and discussing the reasons for the requested  
25 continuance with my attorney, I knowingly and voluntarily ask this Court to grant  
26 that motion to continue and reset the trial date from its current date of February 22,  
27

1 2022, to a date not later than August 22, 2022, for the following reasons as found in  
2 18 U.S.C. § 3161: The case has been declared complex. The substantial discovery  
3 will be organized and provided to counsel. The Defendant and his counsel need time  
4 to review the substantial discovery and additional time is needed to prepare for trial.  
5

6  
7 Approved by Phone

8 Defendant Rana Kaabawi

9 Date: 1/31/2022

10 I have read this form and discussed the contents with my client.  
11

12 *s/Kent Neil Doll, Jr.*

13 Kent Neil Doll, Jr., WSBA 40549

14 Attorney for Defendant Rana Kaabawi

15 Date: 1/31/2022  
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